
Anti Money Laundering Policy

1. DEFINITION OF MONEY LAUNDERING

Money Laundering is the process of converting funds, received from illegal activities (such as fraud, corruption, terrorism, etc.), into other funds or investments which look legitimate to hide or distort the real source of funds.

The process of money laundering can be divided into 3 sequential stages:

- Placement. At this stage funds are converted into financial instruments like checks, bank accounts, money transfers or can be used for purchasing high-value goods that can be resold. They can also be physically deposited into banks and non-bank institutions (e.g., currency exchangers). To avoid suspicion by the company, the launderer may as well make a number of deposits instead of depositing the whole sum at once; this form of placement is called smurfing.
- Layering. Funds are transferred or moved to other accounts and other financial instruments. It is performed to disguise the origin and disrupt the indication of the entity that made the multiple financial transactions. Moving funds around and changing in their form makes it complicated to trace money being laundered.
- Integration. Funds get back into circulation as legitimate to purchase goods and services.

2. INTRODUCTION

Lucky Ant Trading Ltd , a company duly registered under the laws of Saint Lucia as an International Business Company (IBC) (Reg No 2024 - 00244), having its address at Top Floor, Rodney Court Building, Rodney Bay, Gros Islet, Saint Lucia operates in compliance The company when incorporated will do no business in Saint Lucia and hereby elects under section 109 of the International Business Companies Act, 1999, and also regulated by the Money Services Businesses (MSBs) pursuant to the Bank Secrecy Act (BSA) regulations at 31 CFR 1022.380(a)-(f), administered by the Financial Crimes Enforcement Network (FinCEN) under a MSB Registration Number: 31000262677236 (hereinafter referred to as the "Company"), like the majority of companies providing services on the financial market, adheres to principles of Anti-Money Laundering (hereinafter referred to as the "AML") and actively prevents any actions that aim or facilitate the process of legalisation of illegally gained funds. AML policy means preventing the use of the Company's services by criminals, with the aim of money laundering, terrorist financing or other criminal activity.

For this purpose, a strict policy on the detection and prevention of any suspicious activities and reporting the corresponding regulatory bodies was introduced by the Company.

Moreover, the Company has no right to report to Clients that the law enforcement bodies are informed on their activity. Complex electronic system for identifying every Company's Client and conducting a detailed monitoring of all operations was introduced as well.

To prevent money laundering, the Company neither accepts nor pays cash under any circumstances. The Company reserves the right to suspend any Client's operation, that can be regarded as illegal or, may be related to money laundering in the opinion of the Company.

The Policy shall be communicated to all the employees of the Company that manage, monitor or control in any way the client's transactions and have the responsibility for the application of the practices, measures, procedures and controls that have been determined herein. This Policy also applies to all Company's officers, appointed contractors, agents, products and services offered by the Company. All business units within the company will cooperate to create a cohesive effort in the fight against money laundering.

The appropriateness, effectiveness and adequacy of this Policy are the subject of an independent Internal Audit.

3. COMPANY'S PROCEDURES The Company will make sure that it is dealing with a real person or legal entity.

The Company also performs all the required measures in accordance with applicable laws and regulations, issued by the relevant supervisory authorities. This AML Policy is being fulfilled within the Company by means of the following:

- Know Your Customer ("KYC") Policy and Customer Due Diligence ("CDD");
- Ongoing Monitoring of Client's activities;
- Record Keeping. The Company assesses and evaluates the risks it faces based on various criteria, including but not limited to the Client's nature, Client's behaviour, Client's initial communication with the Company, as well as the risks based on the Company's services and securities.

4. KNOW YOUR CUSTOMER AND CUSTOMER DUE DILIGENCE

Due to the Company's commitment to the AML and KYC policies, each Client of the Company has to finish the verification procedure. Before the Company starts any cooperation with the Client, the Company must ensure that satisfactory evidence is produced or such other measures are taken as will produce satisfactory evidence of the identity of any Client or counterparty. The Company as well applies heightened scrutiny to Clients, who are residents of the countries, identified by credible sources as countries, having inadequate AML standards or may represent high risk for crime and corruption and to beneficial owners who reside in and whose funds are sourced from named countries.

5. INDIVIDUAL CLIENTS

During the process of registration, each Client provides personal information, specifically: full name, date and place of birth, residential address, phone number and city code, other information the Company deems necessary.

Individual Client shall provide the following documents (in case documents are written in non-Latin characters, to avoid any delays in the verification process, it is necessary to provide notarized translation of the document into English) because of the requirements of KYC and to confirm the indicated information:

Identity should be verified by:

- Valid Passport; or
- National ID Card; or
- Driver's license; or
- Any other government-issued identification document.

The indicated documents should contain: full name, date of birth, photo, and citizenship of a Client, and also, where applicable: confirmation of the document validity (issue and/or expiry date), holder's signature. The indicated documents must be valid at the time of submission and for at least thirty (30) days from the submission date.

For the purposes of the provisions relating to identification procedures and CDD requirements, proof of identity is satisfactory if:

- it is reasonably possible to establish that the Client is the person he claims to be; and,
- the person who examines the evidence is satisfied, in accordance with the procedures followed under the relevant legislations and regulations, that the Client is actually the person he claims to be.

The current residential address shall be verified by one of the followings:

- A recent utility bill (gas, water, electricity), telephone bill, Internet; or
- Bank statement; or
- Credit card statement; or
- Tax Clearance or Tax Return, Social Security Policy or Insurance Policy, Police Character Certificate, Affidavit, Certificate of Residence or Residence Permit in case if aforementioned documents contain the current residential address and name of the client; or
- Valid Passport or National ID Card or Driver's License which contains the current residential address and name of the client and in countries/regions where this is specifically allowed; or
- Any other government-issued document that contains the current residential address and name of the client.

The utility bill, bank statement and credit card statement should not be older than six (6) months from the submission date. For the other documents, there is no prescribed time frame, however, the documents must be current.

Where the certification is required, the documents should be certified by either one of the followings:

- an Apostille;
- a Judge;
- a Magistrate;
- a notary public;
- a barrister-at-law;
- a Solicitor;
- an attorney-at-law; or
- a Commissioner of Oaths.

Both sides of the submitted document are required where applicable (for example, ID or Driver's License). The image of the document must be a colour high-resolution photo or scan copy with no blurs, light reflections, or shadows. Four edges of the document should be visible. All information should be clearly readable, free of any watermarks, etc.

For each account the Company shall also make reasonable effort, prior to the settlement of the initial transaction, to obtain the following information to the extent it is applicable to the account:

- Occupation of the Client;
- The Client's investment objective and other related information concerning the Client's financial situation and needs;
- Annual income, Assets or net worth;
- Other information the Company deems necessary for opening an account.

6. CORPORATE CLIENTS

In case the applicant company is listed on a recognised or approved stock exchange or where there is independent evidence to show that the applicant is a wholly owned subsidiary or subsidiary under the control of such a company, no further steps to verify identity will normally be required.

In case the company is unquoted and none of the principal directors or shareholders already has an account with the Company, the official provides the following documents because of the requirements of KYC:

- Copies of the Certificate of Registration/Certificate of Incorporation;

- Copies of the Memorandum and Articles of Association, Partnership Agreement or similar, as appropriate;
- Copies of the By-Laws and latest General Information Sheet, which lists the names of directors/partners and principal stockholders, and secondary licences;
- Extract from Commercial Register, or equivalent document, proving the registration of corporate acts and amendments and current state of the legal person such as Certificate of Good Standing;
- Copy of the Certificate of Incumbency issued not older than 3 months from the filing date;
- Information about the BOs of the company from the independent and reliable sources;
- KYC documents of all Directors, Shareholders, BO's and Officers of the legal person where applicable;
- Appropriate Board of Directors' resolutions and signed application forms or account opening, identifying the authorised signatories or principal officers of the corporation authorised to open an account, to trade and their authorities and specimen signatures;
- Evidence of the registered address and actual place of business of the legal person;
- Latest Audited Financial Statements (if applicable);
- Where applicable, the Company may also require additional information about the nature of the business of Clients such as the description and nature of business (including date of commencement of business, products or services provided, principal place of business).

This procedure is performed to establish the identity of the Client and to help the Company know/understand Clients and their financial dealings to be able to provide the best services of online trading.

7. ADDITIONAL PROVISIONS

If, during the business relationship, the Client fails or refuses to submit, within a reasonable timeframe the required verification data and information, the Company shall terminate the business relationship and close all the accounts of the Client.

Customer Due Diligence regarding the Individual Clients, as well as Corporate Clients shall be updated and/or amended soon after any changes take place. This refers to change of residential or business address, new identification cards, new passport, additional business information, new business securities/venture, and the like. For any change of information before the said period the Company requests a letter or document pertaining to the changes being made.

When accepting new Clients during the verification process and documents review The Company reserves the right to apply other requirements and procedures for the Client's

identification. Such procedures are to be determined at the Company's sole discretion and subject to variations depending on various factors, including but not limited to the country of residence of the Client, Client's profile and others. The Company can request the Client to provide a source of funds, source of wealth documents, proof of funds being deposited in a form and manner as the Company finds appropriate and other documents the Company deems necessary to complete verification procedure.

8. MONITORING OF CLIENTS ACTIVITIES

In addition to gathering information from the Clients, the Company continues to monitor the activity of every Client to identify and prevent any suspicious transactions. A suspicious transaction is known as a transaction that is inconsistent with the Client's legitimate business or usual Client's transaction history known from the Client activity monitoring. The Company has implemented the system of monitoring the named transactions (both automatic and manual) to prevent the use of the Company's services by criminals.

The Company reserves the right to suspend any Client's operation, which can be regarded as illegal or, may be related to money laundering in the opinion of the staff.

The constant monitoring of the Client's accounts and transactions is an imperative element in the effective control of the risk of Money laundering.

9. DEPOSIT AND WITHDRAWAL REQUIREMENTS

All the Clients' operations to deposit and withdraw funds have the following requirements:

- in case of bank transfer or transfer from the bank card, name, indicated during the registration must match the name of the owner of the account/bank card. It is possible to withdraw funds from the account via bank transfer only in the same bank and the same account which you used for depositing;
- in case of using electronic payment systems, withdraw funds from the trading account is possible only on the system and the account used for depositing;
- if the account was credited in the way that cannot be used for funds withdrawal, the funds may be withdrawn to a bank account of the client or any other way may be used, as agreed with the Company with the condition that the Company is able to prove the identity of the account owner;
- if the account has been credited with funds through various payment methods, funds withdrawal shall be made on a pro rata basis commensurate to the size of each deposit. Any profit gained can be transferred to any account from which the deposits arrived as long as such transfer is possible;
- if the account has been credited using various payment methods and one of such methods was a bank card(s), the Company shall only process withdrawal requests to such a bank card(s) until up to the total amount of initial deposit using the bank card(s) is

withdrawn before allowing to create any withdrawal requests via other payment methods and withdrawal of profit gained;

- no deposits and withdrawals to the bank accounts, bank cards, electronic money, or any other kind of payment accounts of third parties are allowed.

10. **RECORD KEEPING** Records will be kept for all documents obtained for the purpose of Client's identification (AML Policy requirements) and all information of each transaction, as well as other information related to the Client received in accordance with the applicable AML laws/regulations.

The following document retention periods will be followed:

- All documents in opening the accounts of Clients and records of all their transactions, especially 6 Clients identification records, shall be maintained and safely stored for seven (7) years from the dates of transactions;

- With respect to closed accounts, the records on Clients identification, account files and business correspondence, shall be preserved and safely stored for at least seven (7) years from the dates when they were closed.